

1 MICHELE BECKWITH
2 Acting United States Attorney
3 BRITTANY M. GUNTER
4 Assistant United States Attorney
5 2500 Tulare Street, Suite 4401
6 Fresno, Ca 93721
7 Telephone: (559) 497-4000
8 Facsimile: (559) 497-4099

9
10
11 Attorneys for Plaintiff
12 United States of America

13
14
15
16
17
18 UNITED STATES DISTRICT COURT
19 EASTERN DISTRICT OF CALIFORNIA

20
21 UNITED STATES OF AMERICA,

22 Plaintiff,

23 v.

24 JESUS ROMERO-VENCES,

25 Defendant.

26 CASE NO: 1:25-MJ-00049-BAM

27 STIPULATION BETWEEN THE UNITED STATES
28 AND DEFENDANT REGARDING PRODUCTION
OF PROTECTED INFORMATION; PROTECTIVE
ORDER

29
30
31 WHEREAS, the discovery in this case contains private personal information regarding third
32 parties, including but not limited to their names, ages, and/or physical descriptions (“Protected
33 Information”); and

34
35 WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the
36 unauthorized disclosure or dissemination of this information to anyone not a party to the court
37 proceedings in this matter;

38 The parties agree that entry of a stipulated protective order is therefore appropriate.

39
40 THEREFORE, defendant JESUS ROMERO-VENCES, by and through his counsel of record,
41 Reed Grantham (“Defense Counsel”), and the United States of America, by and through Assistant
42 United States Attorney Brittany M. Gunter, hereby agree and stipulate as follows:

1 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of
2 Criminal Procedure, as well as its general supervisory authority.

3 2. This Order pertains to all discovery provided to or made available to Defense Counsel as
4 part of discovery in this case (hereafter, collectively known as “the discovery”).

5 3. By signing this Stipulation and Protective Order, Defense Counsel agrees not to share any
6 documents or other information that contain Protected Information with anyone other than Defense
7 Counsel’s attorneys, designated defense investigators, designated defense experts, and support staff.
8 Defense Counsel may permit the defendant to view unredacted documents or other information in the
9 presence of his attorneys, defense investigators, and/or support staff. The parties agree that Defense
10 Counsel, defense investigators, and support staff shall not allow the defendant to copy Protected
11 Information contained in the discovery. The parties agree that Defense Counsel, defense investigators,
12 and support staff may provide the defendant with copies of documents or other information, if any, from
13 which Protected Information has first been redacted.

14 4. The discovery and information therein may be used only in connection with the litigation
15 of this case and for no other purpose. The discovery is now and will forever remain the property of the
16 United States of America (“Government”). Defense Counsel will return the discovery to the Government
17 or alternatively keep it archived within its sole possession at the conclusion of the case.

18 5. Defense Counsel will store the discovery in a secure place and will use reasonable care to
19 ensure that it is not disclosed to third persons in violation of this agreement.

20 6. Defense Counsel shall be responsible for advising the Defendant, employees, and other
21 members of the defense team, and defense witnesses of the contents of this Stipulation and Order.

22 7. In the event that Defendant substitutes counsel, undersigned Defense Counsel agrees to
23 return the discovery to the government, or, at the request of government counsel, to forward it to new
24 ///

25 ///

26 ///

27

28

1 counsel after new counsel has confirmed to government counsel in writing his or her agreement to the
2 terms of this Order.

3
4 IT IS SO STIPULATED.

5 Dated: May 12, 2025

6 By: /s/ REED GRANTHAM
7 REED GRANTHAM
8 Attorney for Defendant

9 Dated: May 12, 2025

10 MICHELE BECKWITH
11 Acting United States Attorney

12 By: /s/ BRITTANY M. GUNTER
13 BRITTANY M. GUNTER
14 Assistant U.S. Attorney

1 MICHELE BECKWITH
2 Acting United States Attorney
3 BRITTANY M. GUNTER
4 Assistant United States Attorney
5 2500 Tulare Street, Suite 4401
6 Fresno, CA 93721
7 Telephone: (559) 497-4000
8 Facsimile: (559) 497-4099

9
10 Attorneys for Plaintiff
11 United States of America

12 IN THE UNITED STATES DISTRICT COURT
13
14 EASTERN DISTRICT OF CALIFORNIA

15
16 UNITED STATES OF AMERICA,

CASE NO. 1:25-MJ-00049-BAM

17 Plaintiff,

18 v.

19 JESUS ROMERO-VENCES,

20 Defendant.

21
22
23
24
25
26
27
28

29 IT IS SO ORDERED.

30 Dated: May 13, 2025

31 /s/ *Eric P. Gris*
32 UNITED STATES MAGISTRATE JUDGE